FOR PUBLICATION

UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

In re: Abel Cosmo Galletti, aka Al Galletti, and Sarah Galletti, Debtors.

United States of America, on behalf of its agency, the Internal Revenue Service,

Appellant,

v.

ABEL COSMO GALLETTI; SARAH GALLETTI,

Appellees.

No. 01-55953 D.C. No. CV-00-00753-VAP

In re: Francesco Briguglio, aka Frank Briguglio, and Angela Briguglio, aka Angie Briguglio, Debtors.

UNITED STATES OF AMERICA,

Appellant,

v.

Francesco Briguglio, aka Frank Briguglio; Angela Briguglio, aka Angie Briguglio,

Appellees.

No. 01-55954 D.C. No. CV-00-00842-VAP ORDER

On Remand from the United States Supreme Court Filed May 24, 2004 Before: Andrew J. Kleinfeld and Susan P. Graber, Circuit Judges, and Susan R. Bolton,* District Judge.

ORDER

These cases come before us on remand from the Supreme Court of the United States. *United States v. Galletti (In re Galletti)*, 314 F.3d 336 (9th Cir. 2002), *reversed and remanded by* 124 S. Ct. 1548 (2004). We now reverse the district court in these consolidated cases and remand for further proceedings in conformity with the Supreme Court's opinion.

REVERSED and REMANDED.

^{*}The Honorable Susan R. Bolton, United States District Court for the District of Arizona, sitting by designation.

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